

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO
LAS CRUCES DIVISION

**SANJUANA QUIROZ, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 2:21-cv-1197-KRS-DLM

DCT ENTERPRISES OF NEW MEXICO, LLC

DEFENDANT

DECLARATION OF ATTORNEY JOSH SANFORD

Pursuant to 28 U.S.C. § 1746, Josh Sanford declares, subject to the penalties for perjury, as follows:

1. My name is Josh Sanford, and I am over the age of 18 and duly qualified to execute this Declaration and to swear to the accuracy of the facts herein contained.

2. I am an attorney licensed and in good standing in the State of Arkansas. I practice law with the law firm of Sanford Law Firm, PLLC (hereinafter “Sanford Law Firm”), which is located in Little Rock, which I founded in Russellville in 2001. I opened an office in Little Rock in 2009 and now predominantly practice in the Arkansas District Courts, together with a busy Western District of Texas practice. We have eight offices throughout the U.S., and we have attorneys living and working in five states.

3. I practice law full-time, and I manage the other attorneys in the Sanford Law Firm. See “Team,” Sanford Law Firm, <https://www.sanfordlawfirm.com/team/> (last viewed 20 July 2023).

4. Including cases now pending, I have prosecuted over 200 wage lawsuits in Texas in the last five years. Some of these were arbitrations.

5. Including cases now pending, I have prosecuted over 500 wage lawsuits in Arkansas in the last ten years.

6. Sanford Law Firm has been recognized as being the premier prosecutor of wage theft violation cases in all federal courts across the United States. <https://unicourt.com/blog/us-district-courts-labor-litigation-2020/> (last visited 9 March 2021).

7. In the course of my law practice, I engage in a significant amount of wage and hour litigation—specifically cases arising under the Fair Labor Standards Act (FLSA) and the comparable Arkansas Minimum Wage Act (AMWA). A significant portion of my case load is in various federal courts around the United States, including trial work in cases arising under Title VII of the Civil Rights Act of 1964, the Equal Pay Act, the FLSA, and the Family and Medical Leave Act.

8. I am licensed to practice law in all state and federal courts in the States of Arkansas, Colorado, and Texas. I am also actively engaged in appellate practice. I have handled cases before almost all county Circuit Courts in the Central and River Valley regions of Arkansas, the United States District Courts for the Eastern and Western Districts of Arkansas, the United States District Courts for the Eastern, Southern, Northern and Western Districts of Texas, United States District Court for the Northern District of Oklahoma, United States District Court for the Southern District of Ohio, the United States District Court for the District of Colorado, the United States District Court for the Eastern District of Michigan, the District Court of Nebraska, the United States District Court for the District of Oregon, and the Fifth, Sixth and Eighth Circuit Courts of Appeals—as well as several other district courts.

9. There is no group of attorneys within 600 miles of Little Rock who have experience comparable to Sanford Law Firm in wage litigation. Including cases currently being prosecuted throughout the country today, Sanford Law Firm has prosecuted over 1,300 wage cases in federal and state courts and in arbitration proceedings. In 2018, only one firm in the United States initiated more wage violation prosecutions than Sanford Law Firm. In 2020, as noted above, Sanford Law Firm ranked first.

10. In 2005, I was voted “Best Attorney” (tie) in a readers’ poll published by *The Courier* in Russellville, Arkansas. Subsequently, in 2008, I served as the President of the Pope County Bar Association. In addition, I am or have been a member of the American, Arkansas, and Pope County Bar Associations, the Arkansas Trial Lawyers Association and the National Employment Lawyers Association.

11. I have been lead counsel on numerous wage and hour cases filed in United States District Courts throughout the nation, including the following: *Craig Lyons, et al. v. Con Agra*, 4:12-cv-245-JM (E.D. Ark.) (over 790 plaintiffs); *Keyli Cruthis, et al. v. Visions, et al.*, 4:12-cv-244-KGB (E.D. Ark.); *James Finley v. Universal Pressure Pumping, Inc.*, SA:12-ca-0654-OG (Western District of Texas); *Michael Alexander v. Hahn Appliance Center, Inc.*, 12-CV-257-CVE-TWL (N.D. Okla.); *Chad Lochridge, et al. v. Lindsey Management, et al.*, 5:12-CV-5047-JLH (W.D. Ark.); *Bill Hollomon, et al. v. AT&T Mobility Services, LLC*, 4:11-cv-600-BRW (E.D. Ark.); *Jeffrey Bacon, et al. v. Eaton Aeroquip, LLC*, 2:11-cv-14103-GD (E.D. Mich.); *Karen “Kay” Roland v. Sharp County Post 336, et al.*, 1:11-CV-85-DPM (E.D. Ark.); *Bennie Watson, et al. v. Surf-Frac Wellhead Equipment Company, Inc.*, 4:11-CV-843 (JLH) (E.D. Ark.); *Robert Terry, et al. v. City of Ola*, 4:11-cv-11-645 (JLH) (E.D. Ark.); *Donald Bateman, et al. v. Frac Tech Services, LLC*, 6:11-cv-

708 (E.D. Tex.); *Kalie Brown, et al. v. Barney's Barn, Inc., d/b/a/ Peaches Gentlemen's Club*, 4:11-cv-224 (SWW) (E.D. Ark.); *Jason Phillips v. Oil Patch Water and Sewer Services, LLC, et al.*, 4:11-cv-776 (JLH) (E.D. Ark.); *David Delock, et al. v. Securitas Security Services USA, et al.*, 4:11-CV-520 (DPM) (E.D. Ark.); *Karen Springs, et al. v. First Student, Inc.*, 4:11-CV-00240 (BSM) (E.D. Ark.); *Teramura v. Walgreen Co.*, 5:12-cv-5244-JLH (W.D. Ark.), and many others.

12. I have also been lead counsel on numerous wage and hour cases that resulted in settlements or judgments in favor of my clients including the following: *Coby Pearce v. Frac Tech Services, LLC*, No. 4:12-cv-651-JLH (E.D. Ark.); *Nicole Collins v. Barney's Barn, Inc., et al.*, No. 4:12-cv-685-SWW (E.D. Ark.); *Joseph Gauthier, et al. v. Trican Well Service, L.P.*, No. 6:13-cv-46-LED (E.D. Tex.); *Jason Roche, et al. v. S-3 Pump Service, Inc.*, No. 5:15-cv-268-XR (W.D. Tex.); *Kristen Whitworth, et al. v. French Quarter Partners, LLC*, No. 6:13-cv-6003-RTD (W.D. Ark.); *Robert Terry v. Yell County Ark.*, No. 4:13-cv-408-SWW (E.D. Ark.); *Jessica Guinn v. D J Trucking*, No. 4:13-cv-559-KGB (E.D. Ark.); *Maria Romero de Lopez, et al. v. Ozark Mountain Poultry, Inc.*, No. 5:13-cv-5272-TLB (W.D. Ark.); *Sean Jordan v. Big E. Foods, Inc.*, No. 4:14-cv-205-BRW (E.D. Ark.); *Patricia Hernandez, et al. v. Simmons Foods, Inc.*, No. 5:14-cv-5159-JLH (W.D. Ark.); *Sean Schneider v. Habitat for Humanity International, Inc.*, No. 5:14-cv-5230-TLB (W.D. Ark.); *Pedro Espinoza v. Car-Son Construction, LLC*, No. 4:14-cv-467-KGB (E.D. Ark.); *Sheila Lyles v. City of Trumann, Ark.*, No. 3:14-cv-210-DPM (E.D. Ark.); and *Kellie McCartney v. Baily and Thompson Tax and Accounting, P.A.*, No. 4:14-cv-561-SWW (E.D. Ark.).

13. I have also been lead counsel on several wage and hour cases in which collective actions have been granted including *Sam Adams v. United Cerebral Palsy of Central Ark., Inc.*, No. 4:16-cv-930-JLH (E.D. Ark.); *James Harris, et al. v. Express Courier International, Inc.*, No. 5:16-cv-5033-TLB (W.D. Ark.); and *Dustin Moore, et al. v. Performance Pressure Pumping Services, LLC*, No. 5:15-cv-432-XR (W.D. Tex.), and dozens of others.

14. Since January of 2015, Sanford Law Firm has filed and prosecuted over 1,100 distinct wage lawsuits throughout Arkansas and Texas. We have also filed cases in Ohio, Kentucky, Tennessee, North Carolina, South Carolina, Florida, Georgia, Alabama, Mississippi, Louisiana, Missouri, and Illinois. Many of these lawsuits are or were group or collective actions, as well as several class actions under Rule 23.

15. Collectively, cases filed by the Sanford Law Firm since 2009 have resulted in far more than \$13,000,000.00 in settlements and judgments for wage and hour violations for more than three thousand clients across the nation.

16. The National Association of Legal Fee Analysis (NALFA) reports, based on a national survey of more than 2,000 litigators, that the average rate for plaintiffs' attorneys engaged in complex litigation in 2020 was \$445.00 per hour. See "NALFA Releases 2020 Average Hourly Rates in Litigation," NALFA, <http://www.thenalfa.org/blog/nalfa-releases-2020-average-hourly-rates-in-litigation/> (last visited 5 April 2021). It has been estimated that the cost of living in New Mexico is nine percent (9%) lower than the national average. See "Cost of Living in New Mexico," RentCafe, <https://www.rentcafe.com/cost-of-living-calculator/us/nm/> (last visited August

14, 2022). My rate is ninety-one percent (91%) of the national average calculated by NALFA and is supported by my qualifications.

17. The rates charged by Sanford Law Firm's attorneys are reasonable. The rates are reflective of the number of years each attorney has practiced, the attorneys' expertise in employment issues such as the FLSA, the contingent nature of an award of fees, and the rates charged by other attorneys specializing in FLSA work. The staff time and hourly rate for the Sanford Law Firm below are likewise reasonable and comparable.

18. Individual billing requested in this case, including the requested hourly rates for each attorney and support staff member, is summarized below:

Billed By	Rate	Time	Value
April Rhéaume	\$245.00	0.30	\$73.50
Courtney Lowery	\$185.00	1.00	\$185.00
Joanie Harp	\$185.00	2.00	\$370.00
	\$220.00	6.00	\$1,320.00
Josh Sanford	\$404.00	1.70	\$686.80
	\$470.00	1.20	\$564.00
Karolina Viehe	\$275.00	6.30	\$1,732.50
Samuel Brown	\$220.00	1.20	\$264.00
Sean Short	\$255.00	1.10	\$280.50
Stacy Gibson	\$245.00	.90	\$220.50
	\$290.00	1.90	\$546.50
Vanessa Kinney	\$305.00	1.40	\$427.00
	\$360.00	5.20	\$1,872.00
Law Clerk	\$100.00	3.90	\$390.00
	\$110.00	1.00	\$110.00
Paralegal	\$125.00	1.30	\$162.50
	\$145.00	1.40	\$203.00
Staff	\$75.00	1.30	\$97.50
Grand Total		39.10	\$9,505.30

19. Each attorney's hourly rates are supported by their skills and experience, some of which are described more thoroughly below:

- a. Attorney April Rhéaume graduated from the UALR William H. Bowen School of Law with high honors in 2015. While attending law school, Ms. Rhéaume clerked in the Arkansas Attorney General's Office and the Arkansas Securities Department, as well as with several law firms in Little Rock, Arkansas. Ms. Rhéaume has experience in administrative law, legislation, litigation, mediation, contract drafting and settlement negotiations, and focuses her practice primarily on employment law.
- b. Attorney Courtney Lowery graduated magna cum laude from the University of Arkansas at Little Rock, William H. Bowen School of Law in 2019. She served on the Law Review Editorial Board and was a member of the Student Animal Legal Defense Fund as well as the student chapter of the Arkansas Association of Women Lawyers. During law school, Ms. Lowery was a law clerk for the Sanford Law Firm and joined the firm after taking the Arkansas Bar Exam. Both as a law clerk and an attorney, her practice focused heavily on employment law litigation. In a short time, Ms. Lowery has become an expert in screening and drafting FLSA claims and has already obtained favorable settlements for several clients. In 2020, no attorney in the United States drafted more FLSA lawsuits than Ms. Lowery.
- c. Attorney Joanie Harp earned her Juris Doctor from the University of Arkansas at Little Rock, William H. Bowen School of Law, where she was a member of the University of Arkansas at Little Rock Law Review and the Dean's Student Advisory Committee. She also participated as a Dean's Fellow where her group won the inaugural Bowen Award for the Part-Time Student Success Team of the Year. Although Ms. Harp's current practice consists primarily of wage and hour litigation, prior to joining Sanford Law Firm, PLLC, Ms. Harp's engaged in varied litigation, including intellectual property, entertainment, contract, landlord-tenant, criminal and appellate work. Ms. Harp is also a member of the Arkansas Lawyer Wellness Taskforce.
- d. Attorney Karolina Viehe graduated magna cum laude from Valparaiso University School of Law in 2012. Ms. Viehe was an Honors Program Participant. Her practice focuses primarily on employment law, including the FLSA. While attending law school, Ms. Viehe served as the President of Amnesty International Association and was a member of the Intellectual Property Law Association. Also as a law student, Ms. Viehe served as the Judicial Extern for the Honorable Magistrate Judge William G. Hussmann of the U.S. District Court for the Southern District of Indiana and as Certified Legal Intern for the Vanderburgh County Prosecutor's Office.
- e. Attorney Samuel Brown graduated cum laude from the University of Arkansas at Little Rock, William H. Bowen School of Law. During law school, Mr. Brown clerked at several law firms as well as the Arkansas

Municipal League. Mr. Brown also completed an externship with the Honorable Magistrate Judge Beth Deere in the Eastern District of Arkansas. Mr. Brown's practice particularly emphasizes settlements in wage and hour cases under the FLSA. Mr. Brown capably administers and finalizes several FLSA wage case settlements per week.

- f. Attorney Sean Short graduated from the Washington University in St. Louis School of Law in 2013. Since 2016, Mr. Short's legal practice has focused almost exclusively on wage and hour litigation. As a law student, Mr. Short completed a clerkship in Washington D.C., with the Department of Justice's Federal Tort Claims Act Section. Prior to joining Sanford Law Firm, Mr. Short worked in Bangkok, Thailand in the litigation department of an international law firm, as well as a multi-national software development company.
- g. Attorney Stacy Gibson graduated cum laude from the University of Arkansas School of Law in 2014. While attending law school, Ms. Gibson was a Note and Comment Editor for the Journal of Food Law & Policy. Ms. Gibson litigated family law, probate, and general civil matters throughout the state before focusing her practice on FLSA cases. She has served as co-counsel on numerous single-plaintiff and collective action FLSA cases in Arkansas district courts and in arbitration, as well as served as lead counsel in a collective action for a group of 189 plaintiffs in the Southern District of Mississippi. She has litigated several FLSA cases for law enforcement officers, including this one. Ms. Gibson is a member of the Arkansas Trial Lawyers Association. Ms. Gibson has worked on hundreds of wage cases.
- h. Attorney Vanessa Kinney is a 2007 high honors graduate of the University of Arkansas at Little Rock, William H. Bowen School of Law, graduating eighth in her class. While attending law school, Ms. Kinney was a member of the University of Arkansas at Little Rock Law Review and had an article published in the Winter of 2006 issue. While attending Law School, Ms. Kinney served in the Law School's Litigation Clinic under a special license to practice law under the supervision of a licensed attorney. Since joining Sanford Law Firm, Ms. Kinney has served as both lead attorney and co-counsel on bench and jury trials in both federal and state courts and currently focuses primarily on briefing issues in FLSA cases. Ms. Kinney focuses her practice primarily in the area of employment law, particularly the Fair Labor Standards Act and Arkansas Minimum Wage Act. Ms. Kinney's wage and hour experience dates back to 2010, and she has experience in wage and hour cases from the inception of cases to trial, and all the way through the appeals process. Ms. Kinney has worked on hundreds of wage lawsuits and is the primary drafter of briefs and motions that are second to none.

20. The Sanford Law Firm's work focuses on representing workers in employment matters, and its lawyers focus their practices in the area of the FLSA and similar wage-and-hour cases. In the community of attorneys who focus their practice in this area of the law, the Sanford Law Firm has a strong reputation for its quality of work and diligent representation of its clients.

21. The lawyers at the Sanford Law Firm often have opportunities for greater responsibility and experience than many of their peers in the legal community with the same years of experience practicing law. What I mean by this is that because of the management style at the Sanford Law Firm, lesser-experienced attorneys are able to independently manage their own cases with the oversight of more experienced attorneys and are supported by a firm culture of collaboration and accessibility to all Sanford Law Firm attorneys. Lesser-experienced attorneys with Sanford Law Firm find themselves effectively navigating litigation with far more experienced opposing counsel, as well as successfully taking on far more responsibility than many of their peers of equal experience at other law firms.

22. Due to this culture of personal responsibility, conferences between attorneys of differing levels of experience ensure that less experienced attorneys receive the benefits of the skills and knowledge of more experienced attorneys.

23. Sanford Law Firm represented Plaintiff in this case on a contingency basis and paid all out-of-pocket costs, including filing and service fees, copying costs, and other such expenses without any assurances that fees or costs would be recovered. The "contingency" fee award sought by Sanford Law Firm is not a contingency fee in the traditional sense whereby an attorney takes a portion of the plaintiff's recovery. Rather,

Sanford Law Firm relies on the fee-shifting provisions of the FLSA and AMWA to recover their fees in this case.

24. Not only is there no guarantee that any fees and costs will be recovered in a contingency fee case, but any recovery made will be delayed as compared to clients who make up-front or monthly payments as litigation proceeds. In contingency fee cases, an attorney is not paid for months or even years, depending on how long it takes for litigation to conclude.

25. This type of work is time-consuming and rigorous, and the amount of time spent by our firm at each step in this case is reasonable. It is not uncommon in the course of my practice for clients with similar cases to incur attorney's fees that are as much as or more than those in this case.

26. With these matters in mind, I reviewed the hourly rates for the attorneys and staff that the Sanford Law Firm is seeking in this case.

27. Based on my experience and knowledge, it is my opinion that these hourly rates are reasonable given the attorneys' skills, expertise, and reputations, and they are within the range of rates awarded to attorneys with similar backgrounds and experience.

28. The request for attorney's fees and costs is based upon contemporaneous time and expense records maintained by Sanford Law Firm as a matter of ordinary and customary business practice. The time and billing records identify the amount of time expended, the tasks performed, the rate of the particular timekeeper involved, and the costs incurred. A true and accurate copy of a spreadsheet reflecting relevant legal services rendered and time expended on this case through August 3, 2022, is attached hereto as Exhibit A (hereinafter "Billing Spreadsheet").

29. Each task reflected in the attached Billing Spreadsheet was necessary to the successful resolution of this matter; the hours expended were actually expended on the topics stated; the time spent on each task was reasonable; and the rates claimed are also reasonable.

30. Conferences between the attorneys of the Sanford Law Firm, as well as between attorneys and staff of the Sanford Law Firm, are critical to the success of cases like this one because they improve the efficiency and quality of attorney work. Tasks can be delegated to Sanford Law Firm attorneys who are more experienced in certain types of projects or topics to increase the speed, accuracy or quality for accomplishing the task, or to attorneys whose hourly rates are lower to keep costs down, especially where the speed at which a task can be accomplished will be largely the same regardless of who performs the task. In the case of collective actions, in-house conferences allow attorneys to share the load of multi-plaintiff litigation.

31. Attorney conferences also increase efficiency because they allow attorneys to share their specific legal knowledge of particular topics, thereby preventing an attorney who is working on a project from having to spend time doing the research, creating a new legal form, or otherwise “re-inventing the wheel.” In this way, even less experienced attorneys are able to work more efficiently and with greater quality than other attorneys of comparable experience. In fact, this “communal” knowledge benefits even more experienced attorneys who may be assisted by a less experienced attorney who simply has a particular skill set or knowledge of a topic that can be quickly shared through communication.

32. Because of Sanford Law Firm's collective knowledge of and experience in FLSA work and use of attorney collaboration, Plaintiff's counsel was able to complete tasks efficiently, which served to keep billing lower than it would have been without that knowledge, experience, and collaboration.

33. Attorney-client communication is also critical to the success of Sanford Law Firm cases. First, all communication from clients is important. In my experience, when a client feels he or she is being ignored by attorneys, that reduces the level of trust between the client and the attorney, which damages the attorney-client relationship. This, in turn, makes quality representation of the client extremely difficult and reduces efficiency. Further, attorneys must trust that their clients are reliable and accessible. Approaching deadlines, settlement conferences, and other issues in a case often demand immediate client response, so a healthy attorney-client relationship is a necessary part of the litigation process.

34. One of Sanford Law Firm's strengths is its array of attorneys with specialized knowledge or particular areas of expertise that can participate in cases where their unique skill sets are appropriately utilized. Not every attorney has to know everything about the FLSA, damages calculations, negotiation strategy, settlement agreements, or other aspects of litigation because every Sanford Law Firm attorney has access to all of the other Sanford Law Firm attorneys and their collective knowledge. This saves time because individual attorneys can gain knowledge through brief conversations with other attorneys rather than through time-consuming legal research on an issue. Even where legal research is required, the focus of that research can often be narrowed through consultation with other attorneys.

35. Where appropriate, Sanford Law Firm attorneys also delegate work to paralegals, law clerks, and staff. The hourly rates charged for Sanford Law Firm's paralegals, law clerks, and staff are reasonable. See e.g., *Graham v. Vengroff, Williams & Assocs.*, No. 02-0369 MV/RLP, 2004 U.S. Dist. LEXIS 31029, at *16-17 (D.N.M. Oct. 4, 2004) (awarding \$90.00 per hour for law clerk legal work); *O Centro Espirita Beneficente Uniao Do Vegetal in the United States v. Duke*, 343 F. Supp. 3d 1050, 1084 (D.N.M. 2018) (awarding paralegal rates between \$125.00 and \$150.00 per hour). The work performed by support staff members in this case was necessary to the litigation and the time spent on those tasks was reasonable.

36. The total overall billing reflected in the Billing Spreadsheet is \$9,505.30. Although the work reflected in the Billing Spreadsheet was reasonable, a twelve percent (12%) reduction in the total billing amount is sufficient to address any billing that the Court may find to be unnecessary or inefficient. Therefore, the total fee amount requested is \$8,364.66, which accounts for this twelve percent reduction in overall billing.

37. In addition, court costs and recoverable expenses were also incurred in this matter. These costs, totaling \$527.60, are included in the Costs Invoice attached hereto as Exhibit B. The costs and expenses detailed in the Invoice that have been advanced by the Sanford Law Firm on behalf of Plaintiff, and which Plaintiff is contractually obligated to reimburse Sanford Law Firm out of any recovery in this case.

38. The amount of the costs requested is correct. The costs stated were necessarily incurred during the case, the services giving rise to the costs were actually and necessarily performed.

39. In sum, the total amount of fees and costs requested is \$8,892.26.

**PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY
UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING
IS TRUE AND CORRECT.**

Executed on this day July 25, 2023.

/s/ Josh Sanford

JOSH SANFORD

Date Billed On	Billed By	Description	Rate	Time	Value	Entry #
11/2/2021	Josh Sanford	Examination of signed contract	\$404.00	0.10	\$40.40	1
11/2/2021	Josh Sanford	Conference with AS: potential case	\$404.00	0.10	\$40.40	2
11/5/2021	Law Clerk	Compose and prepare Client's Complaint for Filing with the Clerk of Court	\$100.00	0.60	\$60.00	3
12/17/2021	April Rhéaume	Receipt and review of complaint filed	\$245.00	0.10	\$24.50	4
12/17/2021	Courtney Lowery	Receive, read and prepare response to email(s) from court clerk re summons	\$185.00	0.10	\$18.50	5
12/17/2021	Courtney Lowery	Compose electronic communication to court clerk re request for issuance of summons	\$185.00	0.10	\$18.50	6
12/17/2021	Courtney Lowery	Work on Client's file: finalize and efile complaint	\$185.00	0.40	\$74.00	7
12/17/2021	Courtney Lowery	Editing and revision of Complaint, CTJ and Summons	\$185.00	0.40	\$74.00	8
12/17/2021	Josh Sanford	Examination of filed complaint; judge assignment	\$404.00	0.10	\$40.40	9
12/17/2021	Josh Sanford	Editing and revision of summons and CCS	\$404.00	0.10	\$40.40	10
12/17/2021	Josh Sanford	Editing and revision of complaint	\$404.00	0.20	\$80.80	11
12/19/2021	Josh Sanford	Examination of request for summons	\$404.00	0.10	\$40.40	12
12/20/2021	Josh Sanford	Examination of summons	\$404.00	0.10	\$40.40	13
12/21/2021	Staff	Work on Client's file: send complaint for service	\$75.00	0.10	\$7.50	14
1/5/2022	April Rhéaume	Conference with AD, SG, and AR re: case status and next steps	\$245.00	0.10	\$24.50	15
1/20/2022	April Rhéaume	Receipt and review of proof of service	\$245.00	0.10	\$24.50	16
4/22/2022	Josh Sanford	Conference with TF: service status	\$404.00	0.10	\$40.40	17
4/26/2022	Stacy Gibson	Conference with RM re: default motion	\$245.00	0.10	\$24.50	18
5/4/2022	Josh Sanford	Examination of order	\$404.00	0.10	\$40.40	19
5/12/2022	Joanie Harp	Receive, read and prepare response to email(s) from ZB on filing	\$185.00	0.10	\$18.50	20
5/12/2022	Joanie Harp	Conference regarding case status and deadlines	\$185.00	0.10	\$18.50	21
5/12/2022	Josh Sanford	Receive, read and prepare response to email(s) from SG/JH: response to order	\$404.00	0.10	\$40.40	22
5/12/2022	Paralegal	Compose electronic communication to JH re: reviewing motion for entry of default	\$125.00	0.10	\$12.50	23
5/12/2022	Paralegal	Draft Motion for entry of default	\$125.00	0.40	\$50.00	24
5/12/2022	Stacy Gibson	Conference regarding case status and deadlines	\$245.00	0.10	\$24.50	25
5/12/2022	Staff	Preparation and drafting of MTW for AR	\$75.00	0.10	\$7.50	26
5/13/2022	Joanie Harp	Examination of court filings	\$185.00	0.10	\$18.50	27
5/13/2022	Joanie Harp	Conference with SG	\$185.00	0.10	\$18.50	28
5/13/2022	Josh Sanford	Editing and revision of JS dec	\$404.00	0.10	\$40.40	29
5/13/2022	Josh Sanford	Editing and revision of motion for default	\$404.00	0.10	\$40.40	30
5/13/2022	Paralegal	Preparation and drafting of declaration of JS	\$125.00	0.30	\$37.50	31
5/13/2022	Stacy Gibson	Conference with JH re: default declaration	\$245.00	0.10	\$24.50	32
5/16/2022	Joanie Harp	Examination of Motion & Dec	\$185.00	0.10	\$18.50	33
5/16/2022	Josh Sanford	Examination of filed motion for default	\$404.00	0.10	\$40.40	34
5/16/2022	Josh Sanford	Receive, read and prepare response to email(s) from ZB: response to order	\$404.00	0.10	\$40.40	35
5/16/2022	Paralegal	Perform legal research regarding local rules for filing motions	\$125.00	0.20	\$25.00	36
5/16/2022	Paralegal	Compose electronic communication to JH re: review of motion for entry of default	\$125.00	0.10	\$12.50	37
5/16/2022	Paralegal	Editing and revision of Motion and declaration for entry of default	\$125.00	0.10	\$12.50	38

5/31/2022	Joanie Harp	Conference regarding case deadlines/next steps	\$185.00	0.10	\$18.50	39
6/3/2022	Joanie Harp	Receive, read and prepare response to email(s) from GM and reply SG ZB GM	\$185.00	0.20	\$37.00	40
6/3/2022	Stacy Gibson	Receive, read and prepare response to email(s) from JH re: 2nd plaintiff	\$245.00	0.10	\$24.50	41
6/6/2022	Joanie Harp	Compose electronic communication to SC re drafting motion and BIS	\$185.00	0.10	\$18.50	42
6/6/2022	Law Clerk	Draft Motion for default judgement	\$100.00	0.40	\$40.00	43
6/6/2022	Law Clerk	Draft Motion for default judgement	\$100.00	2.40	\$240.00	44
6/6/2022	Law Clerk	Conference with JH re: turnaround time of motion	\$100.00	0.10	\$10.00	45
6/7/2022	Law Clerk	Draft Motion for default judgment	\$100.00	0.40	\$40.00	46
6/10/2022	Joanie Harp	Conference with SC re edits	\$185.00	0.10	\$18.50	47
6/14/2022	Josh Sanford	Examination of clerks entry of default	\$404.00	0.10	\$40.40	48
6/14/2022	Josh Sanford	Examination of order	\$404.00	0.10	\$40.40	49
6/15/2022	Stacy Gibson	Receive, read and prepare response to email(s) from CL, JS re: 2nd plaintiff	\$245.00	0.20	\$49.00	50
07/21/22	Stacy Gibson	Conference regarding case status/strategy	\$245.00	0.10	\$24.50	51
7/22/2022	Stacy Gibson	Conference regarding case status/strategy	\$245.00	0.10	\$24.50	52
7/25/2022	Joanie Harp	Examination of SQ declaration	\$185.00	0.30	\$55.50	53
7/25/2022	Paralegal	Receive, read and prepare response to email(s) from JS re: motion for default	\$125.00	0.10	\$12.50	54
07/25/22	Josh Sanford	Receive, read and prepare response to email(s) from VK: briefing	\$470.00	0.10	\$47.00	55
7/29/2022	Stacy Gibson	Conference with VK re: default fees	\$245.00	0.10	\$24.50	56
7/29/2022	Vanessa Kinney	Work on Client's file: download and format billing spreadsheet	\$305.00	0.40	\$122.00	57
7/29/2022	Vanessa Kinney	Work on Client's file: privilege review of billing spreadsheet	\$305.00	0.30	\$91.50	58
08/01/22	Vanessa Kinney	Work on Client's File: review default file and create exhibit 2 costs invoice	\$305.00	0.20	\$61.00	59
08/01/22	Stacy Gibson	Receive, read and prepare response to email(s) from VK re: default fees	\$290.00	0.10	\$29.00	60
08/01/22	Stacy Gibson	Compose electronic communication to law clerk re: motion for default and attachments	\$290.00	0.10	\$29.00	61
08/01/22	Stacy Gibson	Receive, read and prepare response to email(s) from staff re: client declaration	\$290.00	0.10	\$29.00	62
08/02/22	Vanessa Kinney	Preparation and Drafting of declaration of Josh Sanford in support of fee request, including updating attorney bios	\$305.00	0.50	\$152.50	63
08/02/22	Vanessa Kinney	Preparation and drafting of declaration of Josh Sanford in support of fee request, including updating attorney bios	\$360.00	0.50	\$180.00	64
08/02/22	Vanessa Kinney	Work on Client's file: Sanford declaration and research hourly rates	\$360.00	1.50	\$540.00	65
8/3/2022	Joanie Harp	Examination of documents for filing	\$185.00	0.40	\$74.00	66
8/3/2022	Joanie Harp	Compose electronic communication (email) to client re case status	\$185.00	0.10	\$18.50	67
8/3/2022	Joanie Harp	Conference with SG & ZB (email) re case status	\$185.00	0.10	\$18.50	68
8/3/2022	Joanie Harp	Telephone Conference(s) between Attorney and Client LMTC	\$185.00	0.10	\$18.50	69
8/3/2022	Stacy Gibson	Receive, read and prepare response to email(s) from JH re: damages calculation	\$245.00	0.10	\$24.50	70
8/3/2022	Staff	Work on Client's file: damage estimate	\$75.00	0.70	\$52.50	71
8/3/2022	Staff	Work on Client's file: damage estimate	\$75.00	0.40	\$30.00	72

08/03/22	Vanessa Kinney	Editing and revision of Billing spreadsheet to add VK time; export newer billing entries and add to billing spreadsheet; create summary table and update Sanford declaration	\$360.00	0.90	\$324.00	73
08/04/22	Joanie Harp	Telephone Conference(s) between Attorney and Client Returned Call went to VM	\$220.00	0.10	\$22.00	74
08/04/22	Joanie Harp	Telephone Conference(s) between Attorney and Client LMTC and texted	\$220.00	0.10	\$22.00	75
08/04/22	Joanie Harp	Telephone Conference(s) between Attorney and Client re case status and available for declaration next week	\$220.00	0.30	\$66.00	76
08/04/22	Stacy Gibson	Compose electronic communication to VK re: billing entries	\$290.00	0.10	\$29.00	77
08/09/22	Paralegal	Compose electronic communication to JH re: declaration information	\$145.00	0.10	\$14.50	78
08/11/22	Sean Short	Receipt and review of damage calculations; review for accuracy/errors.	\$255.00	0.10	\$25.50	79
08/12/22	Josh Sanford	Editing and revision of JS Dec	\$470.00	0.10	\$47.00	80
08/12/22	Josh Sanford	Receive, read and prepare response to email(s) from SG: VK: JS Dec	\$470.00	0.10	\$47.00	81
08/12/22	Stacy Gibson	Compose electronic communication to JS re: fees for default	\$290.00	0.10	\$29.00	82
08/12/22	Stacy Gibson	Receive, read and prepare response to email(s) from VK and JH re: default questions	\$290.00	0.10	\$29.00	83
08/13/22	Vanessa Kinney	Editing and revision of billing spreadsheet; research cost of living in NM, adjust attorney rates; research law clerk billing; update fee documents	\$360.00	2.30	\$828.00	84
08/15/22	Joanie Harp	Work on Client's file: reviewing and editing docs needed for default judgment filing	\$220.00	3.50	\$770.00	85
08/16/22	Sean Short	Editing and revision of motion for default judgment and supporting documents.	\$255.00	0.90	\$229.50	86
08/16/22	Sean Short	Receive, read and prepare response to email(s) from JH regarding motion for default judgment and supporting documents.	\$255.00	0.10	\$25.50	87
08/17/22	Joanie Harp	Telephone Conference(s) between Attorney and Client LMTC re dec and delivery rate clarification	\$220.00	0.10	\$22.00	88
08/17/22	Josh Sanford	Examination of order	\$470.00	0.10	\$47.00	89
08/17/22	Stacy Gibson	Receive, read and prepare response to email(s) from JS re: show cause order	\$290.00	0.10	\$29.00	90
08/18/22	Joanie Harp	Work on Client's file: review edits and damage calcs for filing	\$220.00	1.20	\$264.00	91
08/18/22	Joanie Harp	Telephone Conference(s) between Attorney and Client LMTC and texted	\$220.00	0.10	\$22.00	92
08/18/22	Joanie Harp	Compose electronic communication to client re need her declaration	\$220.00	0.10	\$22.00	93
08/18/22	Josh Sanford	Work on Client's file: default	\$470.00	0.10	\$47.00	94
08/18/22	Paralegal	Editing and revision of damages	\$145.00	0.40	\$58.00	95
08/18/22	Paralegal	Receive, read and prepare response to email(s) from JH re: filing motion for default judgment	\$145.00	0.10	\$14.50	96
08/18/22	Paralegal	Editing and revision of motion for default judgment	\$145.00	0.30	\$43.50	97
08/18/22	Paralegal	Telephone Conference(s) with sanjuana quiroz re: going over declaration information	\$145.00	0.20	\$29.00	98
08/18/22	Paralegal	Editing and revision of client declaration	\$145.00	0.10	\$14.50	99

08/19/22	Paralegal	Compose electronic communication to JH re: client's signed declaration	\$145.00	0.10	\$14.50	100
08/22/22	Josh Sanford	Examination of motin for default	\$470.00	0.10	\$47.00	101
08/22/22	Paralegal	Editing and revision of motion for default judgment	\$145.00	0.10	\$14.50	102
08/26/22	Josh Sanford	Examination of clerks notice	\$470.00	0.10	\$47.00	103
09/01/22	Joanie Harp	Examination of case status	\$220.00	0.10	\$22.00	104
09/15/22	Joanie Harp	Examination of case status	\$220.00	0.10	\$22.00	105
10/12/22	Joanie Harp	Telephone Conference(s) between Attorney and Client re case status. Attorney-client priviledged	\$220.00	0.10	\$22.00	106
10/13/22	Joanie Harp	Examination of case status	\$220.00	0.10	\$22.00	107
10/26/22	Joanie Harp	Work on Client's file: status update	\$220.00	0.10	\$22.00	108
02/06/23	Josh Sanford	Examination of Order	\$470.00	0.10	\$47.00	109
02/24/23	Samuel Brown	Preparation and drafting of Declaration of process server	\$220.00	0.30	\$66.00	110
02/24/23	Stacy Gibson	Editing and revision of process server declaration	\$290.00	0.20	\$58.00	111
02/28/23	Josh Sanford	Examination of Response to Order	\$470.00	0.10	\$47.00	112
02/28/23	Samuel Brown	Preparation and drafting of Motion for Extension of Time to File Response to Show Cause Order	\$220.00	0.30	\$66.00	113
02/28/23	Samuel Brown	Conference with staff re: filing Motion for Extension of Time	\$220.00	0.10	\$22.00	114
02/28/23	Stacy Gibson	Compose electronic communication to SB re: Motion for extension	\$290.00	0.10	\$29.00	115
03/01/23	Josh Sanford	Examination of Order	\$470.00	0.10	\$47.00	116
03/14/23	Samuel Brown	Telephone Conference(s) with process serving agency re: trying to reach process server	\$220.00	0.20	\$44.00	117
03/14/23	Samuel Brown	Editing and revision of Motion for Extension	\$220.00	0.20	\$44.00	118
03/14/23	Samuel Brown	Conference with staff re: filing Motion for Extension	\$220.00	0.10	\$22.00	119
03/14/23	Stacy Gibson	Editing and revision of motion for extension to show cause	\$290.00	0.20	\$58.00	120
03/22/23	Stacy Gibson	Compose electronic communication to SB re: response to show cause order	\$290.00	0.10	\$29.00	121
03/31/23	Josh Sanford	Examination of Minute Entry	\$470.00	0.10	\$47.00	122
04/04/23	Stacy Gibson	Compose electronic communication to JS re: response to show cause	\$290.00	0.10	\$29.00	123
04/04/23	Stacy Gibson	Receive, read and prepare response to email(s) from JS re: response to MTC	\$290.00	0.10	\$29.00	124
04/05/23	Josh Sanford	Discussion of case status and directing case strategy to Attorney SB	\$470.00	0.10	\$47.00	125
04/10/23	Stacy Gibson	Receive, read and prepare response to email(s) from JS and SB re: response to show cause	\$290.00	0.10	\$29.00	126
05/05/23	Stacy Gibson	Receipt and review of order on show cause	\$290.00	0.10	\$29.00	127
05/17/23	Law Clerk	Draft Motion - second joint motion for extension	\$110.00	1.00	\$110.00	128
06/09/23	Stacy Gibson	Compose electronic communication to KV and SB re: motion for default	\$290.00	0.10	\$29.00	129
06/23/23	Karolina Viehe	Receive, read and prepare response to email(s) from SB	\$275.00	0.10	\$27.50	130
07/19/23	Karolina Viehe	Work on Client's file: review of file and pleadings.	\$275.00	0.50	\$137.50	131

07/19/23	Karolina Viehe	Review of docket entry from the Court re: Order Quashing Order to Show Cause and due date for our second motion and email to Sam re: same	\$275.00	0.30	\$82.50	132
07/20/23	Karolina Viehe	Draft Second Motion for Default Judgment and Brief in Support.	\$275.00	2.90	\$797.50	133
07/20/23	Karolina Viehe	Revision to Exhibits to Second Motion for Default Judgment (billing spreadsheet)	\$275.00	1.20	\$330.00	134
07/20/23	Karolina Viehe	Revision to Exhibits to Second Motion for Default Judgment (JS declaration)	\$275.00	1.30	\$357.50	135
				39.10	\$9,505.30	

Matter Expense Report

Date	Description	Amount
4/22/2022	TLO Search Fee for Defendant contact information	\$35.60
2/9/2022	Service Fee to APS	\$90.00
12/17/2021	Filing Fee	\$402.00
Total		\$527.60